

90 Orville Drive, Bohemia, NY 11716-2510 ■ Phone: (631) 244-2000 ■ Fax: (631) 218-7480

0173 5 APR -7 P2:24

Office of Nutritional Products
Labeling & Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

February 23, 2005

MAR 13 2005

Dear Sir or Madam:

This letter will serve as a 30-day notification pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 that NBTY Inc. is using the following statements on our Ester C & Ester E supplements under one or more of the following brand names: American Health, Bioenergy Nutrients, Body Fortress, CVS, Dollar General, Duane Reade, Giant Eagle, Good 'N Natural, Health's Finest, Heartland, HealthSmart Vitamins, HealthWatchers, Kaiser Permanente, Life's Finest, Major, Met-Rx, Natural Wealth, Naturalist, Nature's Bounty, Nutrition Headquarters, Nutrition Warehouse, PhysioLogics, Precision Engineered, Puritan's Pride, Radiance, Rexall, Sam's Club, Shoprite, Sundown, Target, US Nutrition, Vibrant Health, Vitamin World, Walgreens, Walmart and WorldWide Sports:

- Powerful Antioxidant Formula
- Advanced Heart & Immune System Support
- Vitamin C and Vitamin E are powerful antioxidants that help fight cell-damaging free radicals in the body.
- Ester C® is a non-acidic, readily absorbed form of Vitamin C that promotes absorption and delayed excretion of Vitamin C.
- Ester E® is a body-ready, more unique Vitamin E formed when natural d-alpha tocopherol is joined to a phosphate molecule during a patented process.
- Together, this synergistic formula provides support for heart, immune system, and antioxidant health.

The above statements are accompanied by the required disclaimer pursuant to Section 6 of the Dietary Supplement Health and Education Act.

Sincerely,

Angelica S. Vrablic, Ph.D. Manager, Nutrition Research

97S 0162 LET

15846

ASV/mb